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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SECURITIES AND EXCHANGE COMMISSION,)
)
Plaintiff,)
)
vs.)
)
THE CHILDREN'S INTERNET, NASSER V.)
HAMEDANI, SHOLEH A. HAMEDANI,)
PETER A. PEREZ, CORT L. POYNER and)
TWO DOG NET, INC.)
)
Defendants,)

Case Number
C-06-6003-CW

**STIPULATION AND
ORDER SETTING
BRIEFING AND
HEARING SCHEDULE
REGARDING PLAINTIFF
SECURITIES AND
EXCHANGE
COMMISSION'S AND
DEFENDANTS THE
CHILDREN'S
INTERNET'S, NASSER
HAMEDANI'S, SHOLEH
HAMEDANI'S AND TWO
DOG NET'S CROSS-
MOTIONS REGARDING
SCOPE OF REMEDIES
HEARING AS
MODIFIED**

Date: Aug. 14, 2008
Time: 2:00 p.m.
Judge: Claudia Wilken
Courtroom: 2

STIPULATION FOR SCOPE OF REMEDIES BRIEFING

Plaintiff Securities and Exchange Commission ("Commission") has filed its motion seeking equitable and legal remedies against defendants The Children's Internet ("TCI"), Two Dog Net ("TDN"), Nasser Hamedani and Sholeh Hamedani, with the hearing now set for August 14, 2008. On June 26, 2008, TCI, TDN and the Hamedanis filed and served their opposition papers to the Commission's remedies motion, along with their motion to present live testimony and other evidence at the August 14, 2008 remedies hearing. The Commission believes that certain arguments and evidence submitted in TCI's, TDN's and the Hamedanis' opposition papers are beyond the scope of arguments and evidence that are allowed by the Consents that those defendants submitted to the Court during the final pretrial conference on March 18, 2008. The Commission therefore intends to file a motion to exclude certain of those defendants' arguments and evidence from the scope of the remedies hearing and to oppose those defendants' request for an evidentiary hearing.

Judicial economy will be promoted if the Court and the parties know the scope of the remedies hearing before the completion of briefing and counsel's preparation for the hearing. So that they can receive the Court's guidance on the allowable scope of the remedies hearing before the hearing takes place and before the Commission files its reply papers in support of its remedies motion, plaintiff Commission and defendants TCI, TDN, Nasser Hamedani and Sholeh Hamedani have stipulated to the following briefing and hearing schedule:

July 3, 2008. The Commission shall files its opposition to the request for an evidentiary hearing and its cross-motion to exclude evidence and arguments that it believes to be beyond the scope of the Consents.

July 10, 2008. TCI, TDN and the Hamedanis shall file their reply papers in support of their request for an evidentiary hearing and their opposition to the Commission's cross-motion to exclude evidence and arguments.

July 17, 2008. The Commission shall file its reply papers in support of its cross-motion to exclude evidence and arguments.

July 24, 2008 at 2:00 p.m. The Court shall hear TCI's, TDN's and the Hamedanis' motion for an evidentiary hearing and the Commission's cross-motion to exclude evidence and arguments.

1 Because the Commission's trial counsel might be in Miami, Florida on July 24, 2008 for a trial in another
2 case, he may participate by telephone, if necessary.

3 July 31, 2008. The Commission shall file its reply papers in support of its remedies
4 motion against TCI, TDN, Nasser Hamedani and Sholeh Hamedani.

5 August 14, 2008 at 2:00 p.m. The remedies hearing will go forward as scheduled against
6 TCI, TDN, Nasser Hamedani and Sholeh Hamedani, but under such terms and conditions as the Court
7 specifies.

8 DATED: June 27, 2008

Respectfully submitted,

9
10 John S. Yun
John S. Yun
11 Attorneys for the Plaintiff
12 SECURITIES AND EXCHANGE COMMISSION

13 Kevin R. Martin
Kevin R. Martin
14 Randick, O'Dea & Tooliatos, LLP
15 Attorneys for Defendants THE CHILDREN'S
16 INTERNET, NASSER V. HAMEDANI, SHOLEH A.
HAMEDANI and TWO DOG NET, INC.

17 **ORDER SETTING BRIEFING ON SCOPE OF REMEDIES HEARING**

18 Based upon the foregoing Stipulation, the Court hereby sets the following briefing and
19 hearing schedule for plaintiff Securities and Exchange Commission and defendants The Children's
20 Internet ("TCI"), Two Dog Net ("TDN"), Nasser Hamedani and Sholeh Hamedani:

21 July 3, 2008. The Commission shall files its opposition to the request by TCI, TDN and
22 the Hamedanis for an evidentiary hearing and its cross-motion to exclude evidence and arguments that
23 it believes to be beyond the scope of the Consents.

24 July 10, 2008. TCI, TDN and the Hamedanis shall file their reply papers in support of
25 their request for an evidentiary hearing and their opposition to the Commission's cross-motion to exclude
26 evidence and arguments.

27 July 17, 2008. The Commission shall file its reply papers in support of its cross-motion
28 to exclude evidence and arguments.


1 July 24, 2008 at 2:00 p.m. **Unless it has been decided on the papers,** the Court shall
2 hear the TCI's, TDN's and the Hamedanis' motion for an evidentiary hearing and the Commission's
3 cross-motion to exclude evidence and arguments. Because the Commission's trial counsel, Mr. John S.
4 Yun, might be in Miami, Florida on July 24, 2008 for a trial in another case, he may participate by
5 telephone, if necessary.

6 July 31, 2008. The Commission shall file its reply papers in support of its remedies
7 motion against TCI, TDN, Nasser Hamedani and Sholeh Hamedani.

8 August 14, 2008 at 2:00 p.m. The remedies hearing will go forward as scheduled against
9 TCI, TDN, Nasser Hamedani and Sholeh Hamedani, but under such terms and conditions as the Court
10 specifies. **If an evidentiary hearing is necessary, it will be specially set. It will not be held on**
11 **August 14; only argument will be heard on that date.**

12 SO ORDERED.

13 Dated: June_30__, 2008

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15 Claudia Wilken, Judge
16 United States District Court
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